EXHIBIT 4

From: Bolton, Eric

Sent: Tuesday, October 8, 2019 3:40 PM

To: 'jgravatt@dhdglaw.com' <jgravatt@dhdglaw.com>; 'dhauck@dhdglaw.com' <dhauck@dhdglaw.com>; 'dcampbell@dhdglaw.com' <dcampbell@dhdglaw.com>; 'bryan@bjoneslegal.com'
'jek318@gmail.com' <jek318@gmail.com>; 'edward@rebrooklaw.com' <edward@rebrooklaw.com>; 'dinuccilaw@outlook.com>; 'Eli.F.Mosley@gmail.com' <Eli.F.Mosley@gmail.com' <fli.F.Mosley@gmail.com' <matthew.w.heimbach@gmail.com>; 'dillon_hopper@protonmail.com' <dillon_hopper@protonmail.com>; 'isuecrooks@comcast.net' <isuecrooks@comcast.net>
Cc: Levine, Alan <alevine@cooley.com>; Roy III, Daniel P. <droy@cooley.com>; Mills, David <dmills@cooley.com>

Subject: Sines et al v. Kessler et al - W.D. Va. Case 3:17-cv-00072-NKM-JCH

On behalf of Plaintiffs' Counsel attached please find the notice regarding the deposition of Thomas Rousseau. We will be circulating dial-in telephone information for those who cannot attend in person.

Eric Bolton

Senior Litigation Paralegal

Cooley LLP

One Freedom Square ◆ Reston Town Center 11951 Freedom Drive ◆ Reston, VA 20190-5656 Direct: 703-456-8145 ◆ Fax: 703-456-8100 Email: ebolton@cooley.com ◆ www.cooley.com

Assistant: Virginia Kniska

Direct: 703-456-8174 • vkniska@cooley.com

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY, MARISSA BLAIR, APRIL MUNIZ, HANNAH PEARCE, MARCUS MARTIN, NATALIE ROMERO, CHELSEA ALVARADO, THOMAS BAKER and JOHN DOE,

Plaintiffs.

v.

JASON KESSLER, RICHARD SPENCER, CHRISTOPHER CANTWELL, JAMES ALEX FIELDS, JR., VANGUARD AMERICA, ANDREW ANGLIN, MOONBASE HOLDINGS, LLC, ROBERT "AZZMADOR" RAY, NATHAN DAMIGO, ELLIOT KLINE a/k/a/ ELI MOSELY, IDENTITY EVROPA, MATTHEW HEIMBACH, MATTHEW PARROTT a/k/a DAVID MATTHEW PARROTT, TRADITIONALIST WORKER PARTY, MICHAEL HILL, MICHAEL TUBBS, LEAGUE OF THE SOUTH, JEFF SCHOEP, NATIONAL SOCIALIST MOVEMENT, NATIONALIST FRONT, AUGUSTUS SOL INVICTUS, FRATERNAL ORDER OF THE ALT-KNIGHTS, LOYAL WHITE KNIGHTS OF THE KU KLUX KLAN, and EAST COAST KNIGHTS OF THE KU KLUX KLAN a/k/a EAST COAST KNIGHTS OF THE TRUE INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

NOTICE OF DEPOSITION OF THOMAS RYAN ROUSSEAU

PLEASE TAKE NOTICE that pursuant to FRCP 30(b)(1) and the Court's order dated September 6, 2019, Plaintiffs, by and through their undersigned counsel, will take the deposition upon oral examination of Thomas Ryan Rousseau at 9 a.m. on October 16, 2019 before a Notary Public or other person authorized by law to administer oaths. The deposition will take place at the United States District Court for the Northern District of Texas, 501 West 10th Street, Fort Worth, TX 76102-3673. The deposition will be recorded by stenographic means and videotaped. You are invited to attend and cross-examine.

Dated: October 8, 2019 New York, New York

/s/ Alan Levine

Alan Levine (pro hac vice) COOLEY LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 479-6260 Fax: (212) 479-6275 alevine@cooley.com

Of Counsel:

Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Joshua A. Matz (pro hac vice)
Michael L. Bloch (pro hac vice)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jmatz@kaplanhecker.com
jmatz@kaplanhecker.com
mbloch@kaplanhecker.com

Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
William A. Isaacson (pro hac vice)
BOIES SCHILLER FLEXNER LLP
1401 New York Ave, NW
Washington, DC 20005
Telephone: (202) 237-2727
Fax: (202) 237-6131
kdunn@bsfllp.com
jphillips@bsfllp.com
wisaacson@bsfllp.com

Joshua J. Libling (pro hac vice)
Yotam Barkai (pro hac vice)
BOIES SCHILLER FLEXNER LLP
55 Hudson Yards, 20th Floor
New York, NY 10001
Telephone: (212) 446-2300
Fax: (212) 446-2350
jlibling@bsfllp.com
ybarkai@bsfllp.com

Robert T. Cahill (VSB 38562) COOLEY LLP 11951 Freedom Drive, 14th Floor Reston, VA 20190-5656 Telephone: (703) 456-8000 Fax: (703) 456-8100 Email: rcahill@cooley.com

David E. Mills (pro hac vice) COOLEY LLP 1299 Pennsylvania Avenue, NW Suite 700 Washington, DC 20004 Telephone: (202) 842-7800 Fax: (202) 842-7899 dmills@cooley.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019, I served the foregoing upon following counsel and *pro se* defendants, via electronic mail, as follows:

Justin Saunders Gravatt
David L. Hauck
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dhauck@dhdglaw.com
dcampbell@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com

Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South

W. Edward ReBrook The ReBrook Law Office 6013 Clerkenwell Court Burke, VA 22015 edward@rebrooklaw.com

Counsel for Defendants National Socialist Movement, Nationalist Front and Jeff Schoep

Matthew Heimbach matthew.w.heimbach@gmail.com

James E. Kolenich Kolenich Law Office 9435 Waterstone Blvd. #140 Cincinnati, OH 45249 jek318@gmail.com

Elmer Woodard 5661 US Hwy 29 Blairs, VA 24527 isuecrooks@comcast.net

Counsel for Defendants Matthew Parrott, Robert Ray, Traditionalist Worker Party, Jason Kessler, Nathan Damigo, Identity Europa, Inc. (Identity Evropa), and Christopher Cantwell

John A. DiNucci Law Office of John A. DiNucci 8180 Greensboro Drive, Suite 1150 McLean, VA 22102 dinuccilaw@outlook.com

Counsel for Defendant Richard Spencer

Vanguard America c/o Dillon Hopper dillon hopper@protonmail.com

Elliott Kline eli.f.mosley@gmail.com

/s/ Alan Levine

Alan Levine (pro hac vice) COOLEY LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 479-6260 Fax: (212) 479-6275 alevine@cooley.com

Counsel for Plaintiffs